

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA**vs.****ERIC ROBERTS (1)**

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Case No.: 4:20-CR-00314-ALM-CAN

DEFENDANT ERIC ROBERTS' SECOND AMENDED EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION	OFFERED DATE	ADMITTED?
1	Transcript of Motion for Discovery Hearing		
2	Transcript of Chautin Deposition		
3	Government's Search Timeline		
4	Medford Police Department Investigation 15-463		
5	Text message from "Kelvin" inspected by Mesquite police		
6	10333 Denton Drive Unit 303 CCTV Surveillance Notes		
7	10333 Denton Drive #303, Dallas Search Warrant Affidavit		
8	Signed Manana Lease		
9	Manana Floor Plan		
10	HIA Member Code of Ethics		
11-b	Photographs of CBD Hemp Flower Product purchased at CBD Kratom, Dallas, TX on 12/21/2022		
12-b	Photographs of THC-0 Hemp Edible Product from Zar Wellness, Wautege TX on Oct 3 rd 2022		
13-b	Photographs of CBD Cartridge purchased at CBD Kratom, Dallas, TX on 12/21/2022		
14	<i>Encyclopedia Britannica</i> photograph of industrial hemp		
15	Photograph of alleged Marijuana flower in bag found at Clover Haven		

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16	Photograph of alleged Marijuana THC Cartridge found at Clover Haven		
17	Photograph of alleged Marijuana Edible Product found at Aintree		
18	Photograph of Marijuana plant		
19	Texas Farm Bill		
20	Amazon Statement after discontinuing partnership with FedEx		
21-a	Official videography from Lucky Leaf Expo Dallas CBD and Hemp Event – Irving, 2019		
21-b	Lucky Leaf Cannabis, Hemp, CBD Expo Dallas 2019 website advertisement		
21-c	Lucky Leaf Cannabis, Hemp, CBD Expo Dallas 2019 Facebook advertisement		
22	Lucky Leaf Cannabis, Hemp, CBD Expo Dallas 2021 advertisement		
23	Screenshot of CV Sciences Website		
24	Screenshot of Mountain Sciences Facebook		
25	Screenshot of Courier Labs Instagram Account		
26-28	RESERVED		
29	303 Storquest Storage Unit Contract		
30	Photos 2940 Flamingo Circle		
31	2940 Flamingo Circle Appraisal		
32	Photos of Aintree		
33	RESERVED		
34	Photos of 5722 Winton Street		
35	Letter addressed to Nick at Winton		
36	Photos of Donald Blanco Home		
37	Cubed Holdings. LLC Articles of Incorporation		
38	Website Information for Cubed Nano, LLC		
39	Appraisal of 2008 Temperate Drive, Allen TX		
40	Nicholas Simonds Voting Record		
41	Appraisal of 2940 Flamingo Circle		

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42	Appraisal of 6651 Aintree Circle		
43	Appraisal of 5722 Winton Street		
44	Appraisal of 1212 Province Ln		
45-48	RESERVED		
49	6/25/2019 Correspondence re: Angie's List		
50	Cinnamon Malmgren Bar Records		
51	Photos and Instagram of Pink Sugar Studios		
52	LinekdIn Resume of Eric Roberts		
53	Certificate of Formation for Roberts Elite Group, LLC		
54	Assumed Name Certificate for Roberts Elite Group, LLC		
55	Master EFA Agreement for Roberts Elite Group, LLC		
56	PayPal Business Loan Agreement by Roberts Elite Group, LLC		
57	Capital One bank statements – Roberts Elite Group, LLC DBA Elite Contractors Group		
58	Certificate of Filing for Elite Contractors Group		
59	Assumed Name Certificate with Secretary of State for Elite Contractors Group		
60	Certificate of Formation for Elite Custom Designs, LLC		
61-a	Certificate of Filing for Elite Custom Designs, LLC		
61-b	Certificate of Filing for Elite Custom Designs, LLC, Assumed Name Elite Contractors Group		
61-c	Certificate of Filing for Elite Custom Designs, LLC, Assumed Name Texas Cane Corso		
62	Firearms Purchase Paperwork for Eric Ryan Roberts		
63	Certificate of Filing for Elite Auto Group		
64-a	2019 Records of Dog Sales		
64-b	2020 Records of Dog Sales		
65	Review from Ian Wortham		

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66	Assumed Name Certificates with Secretary of State for Elite Network Services		
67	Black Belt Certificates		
68	Photograph of MMA Championship Belt		
69	Texas Private Security Registration (Level 4)		
70-a	Surveillance Photographs of 2474 Manana Drive, Suite #123		
70-b	Photograph of 2474 Manana Drive, Suite #123		
71	Photograph of Workout Area in 2474 Manana Drive		
72	Photographs of Studio inside 2474 Manana Drive, Suite #123 after raid		
73	1Bar LLC Certificate of Formation		
74	Greenville Ave Speakeasy LLC Certificate of Formation		
75	McGuire & Roberts, Inc Certificate of Formation		
76	McGuire & Roberts, Inc 2010 Public Information Report		
77	Pink Sugar LLC Certificate of Formation		
78	Information re: Vanderbilt Wire Transfer		
79	Texas License for Motor Vehicle Dealer		
80	Group Photo at Manana Shop		
81	Public Data Report for LWX5025		
82	Public Data Report for MCT3912		
83	Public Data Report for MLG7878		
84	TLO - Vehicles Registered to 5722 Winton Street & Roberts Elite Group LCC.pdf		
85	Photograph of 1964 Lincoln Continental in email		
86	Photograph of 1964 Lincoln Continental on street		
87	Photograph of Manana shop door after raid		
88	Texts between Milan Skoro and Nick Simonds re: Purchase of Truck		

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89-100	RESERVED		
101	Roberts Elite Group, LLC 2018 Tax Returns		
102	Roberts Elite Group, LLC 2019 Tax Returns		
103	RESERVED		
104	RESERVED		
105	Checks from Account No. 3313727210		
106	Deposits from Account No. 3313727210		
107	Signature Card from Account No. 3313727210		
108	Statements from Account No. 3313727210		
109	Withdrawals from Account No. 3313727210		
110	Capitol One Statements from Account No. 3313727210		
111	Statements from Account No. 4670112573 - Roberts Elite Group		
112	Checks from Account No. 4670112573 - Roberts Elite Group		
113	Deposits from Account No. 4670112573 - Roberts Elite Group		
114	Signature Cards from Account No. 4670112573 - Roberts Elite Group		
115	Withdrawals from Account No. 4670112573 - Roberts Elite Group		
116	Signature Card from Account No. 4670112573 - Roberts Elite Group		
117	Wire from Account No. 4670112573 - Roberts Elite Group		
118	Wire from Account No. 4670112573 - Roberts Elite Group		
119	Wires from Account No. 4670112573 - Roberts Elite Group		
120	Wires from Account No. 4670112573 - Roberts Elite Group		
121	Wires from Account No. 4670112573 - Roberts Elite Group		

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122	5152412902945387 Transaction History: February 2020 - July 2020		
123	Capitol One Statements from Account No. 4670112573 - Roberts Elite Group		
124-129	RESERVED		
130	Voicemails to iPhone XS (0512)		
131	5/21/2020 Inuit Quickbooks Screenshot for Mountain Top Group, LLC		
132	Mountain Top Group TLO		
133	Mountain Top Group Corporate Filings		
134-135	RESERVED		
136	1/23/2020 Invoice from PIVT to Moon Mix		
137	1/23/2020 Invoice from PIVT to Connected International		
138	PIVT Business Account Application		
139	PIVT Lease		
140	PIVT OpenCorporates Page		
141	Correspondence from Stollite Enterprises to PIVT		
142	IsoKlean Preferred Vendors List		
143	Nick Simonds Phone Note re: Pro Vac/PIVT Tax Discussion		
144	Nick Simonds Phone Note re: PIVT Info		
145	Photos of Business Boards		
146	PIVT Corporate Filings		
147-150	RESERVED		
151	Screenshot of "Startup Checklist" 12-12		
152	Screenshot of Pro Vac Credit Card Info		
153	Pro Vac Citibank Welcome Letter		
154	Shipping and Delivery Documentations addressed to Nick Simonds		
155	Hemptech Services Website		
156	Klersun Extractions Website		

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157	“What Does the Hemp-CBD Market Look Like from the Processors’ Perspective?” Hemp Benchmarks Article – September 15 th 2021.		
158	TruePeople Search Results for (214) 457-0512		
159	Text Messages between Eric Roberts and Leslie Donovan		
160	4/26/2018 texts between Nicholas Simonds and Milan Skoro		
161	9/21/2017 Creation of "Donnie Blanco" in Nick Simond's Contact List		
162	3/16/2018 screenshot of text message from Nicholas Simonds' iPhone		
163	5/7/2018 screenshot of text message from "Whale" from Nicholas Simonds' iPhone		
164	5/2/2018 screenshot of text message from "Austin Fielding" in Nicholas Simonds' iPhone		
165	6/29/2019 Text message from Caleb Richmond to Nick Simonds		
166	7/10/2019 text message from "Lorena" to Nick Simonds		
167	8/27/2019-8/28/2019 WhatsApp Correspondence between Nick Simonds and Alex Alejandro		
168	9/4/2019 screenshot of email between Nick Simonds and Ashley Evans from Nicholas Simonds' iPhone		
169	9/20/2019 screenshot of note from Nicholas Simonds' iPhone re: Jarytherm		
170	9/28/2019 screenshot of text message from "Grant" from Nicholas Simonds' iPhone		
171	11/10/2019 text message from Nick Simonds to Caleb Richmond		
172	11/18/2019 Text from Milan Skoro to Nick Simonds		

173	3/28/2019 screenshot of email between Schoonover, Nick Simonds and Milan Skoro		
174	9/3/2019 screenshot of email from Chemtech services to Milan Skoro		
175	9/23/2019 screenshot of email from "Holly" to Milan Skoro, Nick Simonds, and "Cary"		
176	4/26/2018 text from Milan Skoro to Nick Simonds		
177	8/14/2019 text message between Caleb Richmond from Nicholas Simonds' iPhone		
178	9/25/2019 text message between Caleb Richmond from Nicholas Simonds' iPhone		
179	10/1/2019 screenshot of email from Nicholas Simonds' iPhone from gbrown@chemtechservices.com		
180	10/11/2019 screenshot email "Quote for Tilray"		
181	10/11/2019 screenshot of email "Quote for Tilray"		
182	10/11/2019 screenshot of email "Quote for Tilray"		
183	10/14/2019 screenshot of text message from "Luke" from Nicholas Simonds' iPhone		
184	10/14/2019 screenshot of text message from "Luke" from Nicholas Simonds' iPhone		
185	10/28/2019 text screenshot of text message between Milan Skoro from Nicholas Simonds' iPhone		
186	11/6/2019 text message between Milan Skoro from Nicholas Simonds' iPhone re: shipping		
187	11/10/2019 text message from Nick Simonds to Caleb Richmond		
188	11/15/2019 screenshot of Nicholas Simonds contact information on iPhone X and Abigail Simonds' Macbook		

189	12/16/2019 screenshot of text messages with Jay and Milan from Nicholas Simonds' iPhone		
190	12/16/2019 screenshot of text messages with Jay and Milan from Nicholas Simonds' iPhone		
191	1/16/2020 text message from Nick Simonds to "Andrew"		
192	2/5/2020 screenshot of email from "Jay PIVT CA" from Nick Simond's phone		
193	2/18/2020 screenshot of text message from "maybe" Mike Hopson from Nicholas Simonds' iPhone		
194	2/21/2020 Signal messages between Nick Simonds and Than Hau		
195	2/23/2020 screenshot of text message from 817-318-7693 from Nicholas Simonds' iPhone		
196	2/28/2020 photo of business planning whiteboard from Nicholas Simonds' iPhone		
197	2/15/2020 Text Message from Nick Simonds to "Luke"		
198	3/18/2020 screenshot of email from Jay to Nick, Milan and Caleb		
199	2/5/2020 screenshot of email from Jay, "Zev," Milan and Nick		
200	3/9/2020 Text Message from Nick Simonds to "Theresa"		
201	8/5/2020 Text Messages between Eric and Cinnamon Roberts		
202	4/17/2020 screenshot of text message from John Davidson from Nicholas Simonds' iPhone		
203	4/23/2020 screenshot of text message from "AH" from Nicholas Simonds' iPhone		
204	5/8/2020 screenshot of email from Billy Beatty from Nicholas Simonds' iPhone		

205	5/13/2020 screenshot of text message between "Travis" from Nicholas Simonds' iPhone		
206	5/13/2020 Text Message from "Jason" to Nick Simonds		
207	Email from Octave Labs to Nick Simonds		
208	5/13/2020 Text message from Grant Brothers to Nick Simonds		
209	5/18/2020 screenshot of text message with "El Churro" from Nicholas Simonds' iPhone		
210	5/26/2020 screenshot of Klersun Extractions Invoice from Nicholas Simonds' iPhone		
211	12/9/2019 screenshot of email from Chemtech from Nicholas Simonds' iPhone		
212	6/2/2020 screenshot of text message from "Jason," Grant Brothers, and "Chris" from Nicholas Simonds' iPhone		
213	6/2/2020 screenshot of text message between Jason and Chris Bourne from Nicholas Simonds' iPhone		
214	6/3/2020 screenshot of text message from "Ryan" from Nicholas Simonds' iPhone		
215	6/3/2020 screenshot of text message from Mike Hopson, Jason, and (possibly) Chris Bourne from Nicholas Simonds' iPhone		
216	6/8/2020 Text Message from Grant Brothers to Nick Simonds		
217	6/9/2020 screenshot of text message from "Sam" from Nicholas Simonds' iPhone		
218	6/9/2020 screenshot of text message from Nicholas Simonds' iPhone		
219	6/10/2020 screenshot of text message from "Sam" from Nicholas Simonds' iPhone		
220	6/11/2020 screenshot of text message from "Ryan" from Nicholas Simonds' iPhone		

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221	6/17/2020 screenshot of email from Cary Peters Nicholas Simonds' iPhone		
222	6/18/2020 screenshot of text message from Mike Hopson from Nicholas Simonds' iPhone		
223	6/18/2020 screenshot of text message from "Jason" Nicholas Simonds' iPhone		
224	6/20/2020 screenshot of text message from "Jason" and 9719901169 from Nicholas Simonds' iPhone		
225	6/20/2020 screenshot of text message from "Jason" and 9719901169 from Nicholas Simonds' iPhone		
226	6/21/2020 screenshot of text message from "Jason" from Nicholas Simonds' iPhone		
227	6/21/2020 screenshot of text message from "Jason" and 9719901169 from Nicholas Simonds' iPhone		
228	6/21/2020 screenshot of text message with "Samantha" and Mike Hopson from Nicholas Simonds' iPhone		
229	6/21/2020 screenshot of text message from 9719901169 Nicholas Simonds' iPhone		
230	6/21/2020 screenshot of text messages with Mike Hopson and "Samantha" from Nicholas Simonds' iPhone		
231	7/2/2020 screenshot of email from Chemtech services to Milan Skoro from Nicholas Simonds' iPhone		
232	7/13/2020 screenshot of text from Jay on Nick Simond's phone		
233	7/15/2020 photo re: "Jarys," "Curaleaf," from Nicholas Simonds' iPhone		
234	7/20/2020 screenshot of text message from "Andrew F" from Nicholas Simonds' iPhone		

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235	7/22/2020 Instagram messages between Nick Simonds and www.theblacklist.xyz		
236	Screenshot of theblacklist from Nicholas Simonds' iPhone		
237	7/30/2020 screenshot of message from Jay on Nick Simond's phone		
238	7/23/2020-8/5/2020 Text messages between Mark Victory from Nicholas Simonds' iPhone		
239	7/29/2020 - 8/3/2020 chats between Jay Horten from Nicholas Simonds' iPhone		
240	8/3/2020 Text Messages between Milan Skoro from Nicholas Simonds' iPhone re: safe and car title		
241	8/4/2020 Text Messages between Ryan Sholes and Nick re: CBD		
242	8/5/2020 text Messages between Nick Simonds and John D Davidson		
243	Text messages between Nick Simonds, Milan Skoro, and Jay Horten		
244	7/30/2020 screenshot of message from Jay on Nicholas Simonds' iPhone		
245	6/15/2020 WhatsApp messages between Nick Simonds and 44 7368 538042		
246	Nick Simonds Signal Contacts		
247	Contact information re: Wickham Simonds in Item 91 Cellebrite		
248	Voice Mail List of Nicholas Simonds		
249	Chat messages between Caleb Richmond from Nicholas Simonds' iPhone		
250	Text messages between Nick Simonds, Milan Skoro, and Jay Horten		
251	Text messages between Scott Flora and Nicholas Simonds		
252	3/16/2020 text message from Paul Seward to Nick Simonds re: Credit Card information		

253	8/4/2020 text message between Paul Seward from Nicholas Simonds' iPhone re: Canines		
254	Text messages between Nick Simonds and Paul Seward		
255	Text Messages between Nick Simonds and parties re: Paul Deward arrest		
256	Text Message from Kyle Seward to Nick Simonds		
257	Text Messages between Nick Simonds and "Bail Bondsman"		
258	Text messages Between Nick Simonds and George Smith		
259	SMS between Nicholas Simonds and Marcus Capone		
260-a	SMS Messages Between Nick Simonds and Eric Roberts		
260-b	SMS Messages Between Nick Simonds and Eric Roberts		
261	Text Messages between Eric Roberts and Rob W		
262	Text Messages between Eric Roberts and Matt Waddell		
263	Text Messages between Eric Roberts and Bryan Alexander		
264	Text Messages between Eric Roberts and Abby Simonds		
265	Signal Messages Between Nick Simonds and 2144492330 (2148868757)		
266	1/14/2016 Recording re: Cannabis Business on Nicholas Simonds' iPhone		
267	4/15/2018 Recording Pt 1 re: Drug Deal on Nicholas Simonds' iPhone		
268	3/10/2020 Voicemail to Nicholas Simonds	725	
269	6/12/2019 Recording re: Cannabis Business on Nicholas Simonds' iPhone		
270	9/10/2019 Voice mail from 18586959514 to Nick Simonds		
271	9/12/2019 Voice mail from 14804037200 to Nick Simonds		
272	9/25/2019 Voice mail from ??? to Nick Simonds		

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273	12/3/2019 Voice mail from 18173282554 to Nick Simonds		
274	12/3/2019 Voice mail from 14692255649 to Nick Simonds		
275	12/13/2019 Voice mail from 19858760131 to Nick Simonds		
276	1/2/2020 Voice mail from "Gabby" to Nick Simonds		
277	1/23/2020 Voice mail from Carrie Peters to Nick Simonds		
278	1/30/2020 Voice mail from Caleb to Nick Simonds		
279	1/31/2020 Voice mail from Caleb to Nick Simonds		
280	2/3/2020 Voice mail from Alex Zabala to Nick Simonds		
281	2/4/2020 Voice mail from Alex Zabala to Nick Simonds		
282	2/4/2020 Voice mail from Alex Zabala to Nick Simonds		
283	2/6/2020 Voice mail from Carrie Peters to Nick Simonds		
284	2/10/2020 Voice mail from 3044887015 to Nick Simonds		
285	2/12/2020 Voice mail from Will Cook to Nick Simonds		
286	2/18/2020 Voice mail from 18178817653 to Nick Simonds		
287	2/18/2020 Voice mail from 19419539663 to Nick Simonds		
288	2/25/2020 Voice mail from Shaun to Nick Simonds		
289	2/25/2020 Voice mail from 14156476990 to Nick Simonds		
290	2/26/2020 Voice mail from Caleb to Nick Simonds		
291	2/26/2020 Voice mail from 15102696271 to Nick Simonds		
292	2/27/2020 Voice mail from 16416602428 to Nick Simonds		

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293	3/3/2020 Voice mail from 8776233348 to Nick Simonds		
294	3/6/2020 Voice mail from Sean Ragle to Nick Simonds		
295	3/9/2020 Voice mail from 18166783023 to Nick Simonds		
296	3/10/2020 Voice mail from 18166783023 to Nick Simonds		
297	3/16/2020 Voice mail from 8776860680 to Nick Simonds		
298	3/17/2020 Voice mail from Jerry Boyle to Nick Simonds		
299	3/18/2020 Voice mail from Billy Beatty to Nick Simonds		
300	4/7/2020 Voice mail from 17326366700 to Nick Simonds		
301	4/23/2020 Voice mail from Caleb to Nick Simonds		
302	4/27/2020 Voice mail from Dave Decoste to Nick Simonds		
303	5/1/2020 Voice mail from 16824046481 to Nick Simonds		
304	5/4/2020 Voice mail from 18287348019 to Nick Simonds		
305	5/5/2020 Voice mail from Chris Bourne to Nick Simonds		
306	5/8/2020 Voice mail from 18172984154 to Nick Simonds		
307	5/26/2020 Voice mail from 19096057090 to Nick Simonds		
308	6/2/2020 Voice mail from 7326366700 to Nick Simonds		
309	6/2/2020 Voice mail from 5125080565 to Nick Simonds		
310	6/12/2020 Voice mail from 9096057090 to Nick Simonds		
311	6/22/2020 Voice mail from Jay to Nick Simonds		
312	7/2/2020 Voice mail from John Moats to Nick Simonds		

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313	7/9/2020 Voice mail from Kevin to Nick Simonds		
314	7/21/2020 Voice mail from Elizabeth from California All Steel to Nick Simonds		
315	7/23/2020 Voice mail from Shale Flora to Nick Simonds		
316	7/16/2020 Voice mail from Elizabeth with California All Steel to Nick Simonds		
317	7/17/2020 Voice mail from 17209370329 to Nick Simonds		
318	7/23/2020 Voice mail from 16309953202 to Nick Simonds		
319	3/11/2020 Voice Mail to Nick Simonds		
320	3/14/2020 Voice Mail to Nick Simonds		
321	Screenshot of chemicals used in the Cannabis Industry		
322	Nick Simonds list of nicknames associated with phone		
323	Blueprints for Grow House created for Nick Simonds		
324	Nick Simonds Rentspree Application		
325	Notes from Nicholas Simonds' Phone		
326-a	Images Report from Nicholas Simonds' Samsung J7 Phone		
326-b	Notes Screenshots from Nick Simonds' Samsung J7 Phone		
327	9/11/2020 Surveillance Notes of Nicholas Simonds		
328	Nicholas Simonds Business Affiliations		
329	Nicholas Simonds' Driver's License		
330	7/21/2020 Text messages between Nicholas Simonds, Jay Horten, and "John"		
331	2/1/2020-2/14/2020 Text messages between Nicholas Simonds and "Clarion Extracts"		

332	7/29/2020 Text messages between Nicholas Simonds, Jay Horten and "Shawn(8182590942)"		
333-340	RESERVED		
341	9/23/2019 screenshot of 9/23/2019 Email from Abigail Simonds to Nick Simonds, Caleb Richmond, and Jay Horten		
342	Signal Messages between Abigail Simonds from Nicholas Simonds' iPhone		
343	Video of Nick Simonds opening safe		
344	7/22/2020 Text messages from Abby Simonds to Nicholas Simonds		
345	Sales and Shipping Receipts from The Safe Company		
346	Arrive Logistics invoice - John Simonds III		
347	Vindex Group LLC Open Corporates Page		
348	Vindex Group Corporate Filings		
349	RESERVED		
350	Milan Skoro Bizapedia Page		
351	The Union: Honey oil lab faulted in Browns Valley fire		
352	PEOPLE VS. SKORO, MILAN DAVID case information		

Respectfully Submitted,

/s/ Tom Mills

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of this Motion was served electronically via the CM/ECF system to the Assistant United States Attorney, Ernest Gonzalez, on the 17th day of January, 2023.

/s/ Tom Mills

Thomas W. Mills, Jr.